

Lennox S. Hinds, Esq. (NY Bar 8196)
STEVENS, HINDS & WHITE, PC
 116 West 111th Street
 New York, NY 10026-4026
 Telephone: (212) 864-4445
 Facsimile: (212) 222-2680
 lawfirmshw@yahoo.com

Counsel for Plaintiff Sherrie Russell-Brown

IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEW JERSEY

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SHERRIE RUSSELL-BROWN,	:
	:
Plaintiff,	:
	:
v.	Civil Action No. 2:10-cv-04017-SDW-MCA
	:
	:
THE UNIVERSITY OF FLORIDA,	CERTIFICATION OF COUNSEL
BOARD OF TRUSTEES, THE	:
UNIVERSITY OF FLORIDA,	:
LEVIN COLLEGE OF LAW,	:
ROBERT H. JERRY, II, in his	:
individual and official capacities as	:
Dean of the University of Florida,	:
Levin College of Law, THE	:
UNIVERSITY OF OXFORD and	:
OXFORD UNIVERSITY	:
DEVELOPMENT (NORTH AMERICA),	:
INC.,	:
	:
Defendants.	:
	:
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I, Lennox S. Hinds, Esq., under penalty of perjury, hereby certify as follows:

1. I am an Attorney-at-Law of the State of New Jersey and represent the Plaintiff in the above-captioned matter.
2. In this capacity, I am fully familiar with the facts of the within matter.
3. I submit this Certification in support of Plaintiff's Motion for an Order amending Plaintiff's Amended Complaint (Docket Entry No. 7) to name ALM Media, LLC, William L. Pollak and Karen

Sloan, as Defendants, to include the specific factual allegations related to those parties and to provide additional jurisdictional facts.

4. This matter arises out of retaliation Plaintiff has experienced, in New Jersey, as a result of, in main part, her petitioning the Government for redress of her civil rights grievances.

5. In an Order dated December 7, 2010 (Docket Entry No. 43), Plaintiff's First and Second Amended Complaints (Docket Entry Nos. 20 and 39) were stricken because both were filed without leave of Court. And, Defendants were directed to file their responses to Plaintiff's Amended Complaint (Docket Entry No. 7), on or before December 21, 2010.

6. However, ALM Media, LLC, William L. Pollak and Karen Sloan are not named in the Amended Complaint and the Amended Complaint does not include factual allegations related to them, because the need to add those parties only arose as a consequence of the Defendants' actions subsequent to the filing of Plaintiff's Amended Complaint. Subsequent to Plaintiff filing her Amended Complaint on August 31, 2010, Defendants engaged in new acts of retaliation, through the publication of false and defamatory articles, with the assistance of ALM Media, LLC, William L. Pollak and Karen Sloan. Those parties are responsible for the publication of the false and defamatory articles, which have caused Plaintiff serious harm, and are necessary to the case.

7. No previous request for leave to amend has been sought.

8. The statute of limitations has not expired on the matters involving ALM Media, LLC, William L. Pollak and Karen Sloan. The Motion to Amend Complaint is timely because this action is at an extremely early stage. The parties have not engaged in any discovery nor made their initial disclosures. Defendants have not answered the Amended Complaint yet. Defendants will suffer no prejudice whatsoever by amendment to the Amended Complaint in this suit, at this stage.

9. Plaintiff has not submitted a formal brief to support this Motion to Amend Complaint because the principles which govern its determination are well-known and uncontroversial.

10. A true and correct copy of the proposed First Amended Complaint is attached hereto as Exhibit 1.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are wilfully false, I am subject to punishment.

s/ Lennox S. Hinds
Lennox S. Hinds

Dated: New York, New York
December 9, 2010